

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,
v.
**COMMSCOPE HOLDING COMPANY, INC.,
COMMSCOPE INC., ARRIS
INTERNATIONAL LIMITED, ARRIS
GLOBAL LTD., ARRIS US HOLDINGS, INC.,
ARRIS SOLUTIONS, INC., ARRIS
TECHNOLOGY, INC., and ARRIS
ENTERPRISES, LLC**

Defendants.

CIV. A. NO. 2:21-CV-310-JRG
(Lead Case)

TQ DELTA, LLC,

Plaintiff,
v.
**NOKIA CORP., NOKIA SOLUTIONS AND
NETWORKS OY, and NOKIA OF AMERICA
CORP.,**

Defendants.

CIV. A. NO. 2:21-CV-309-JRG
(Member Case)

**UNOPPOSED MOTION FOR REQUEST FOR HEARING ON DEFENDANTS'
SECOND OPPOSED MOTION FOR ENTRY OF ORDER FOCUSING PATENT
CLAIMS (DKT. NO. 243)**

Defendants Nokia of America Corporation, Nokia Corporation, and Nokia Solutions and Networks, Oy (collectively, “Nokia”), and CommScope Holding Company, Inc., CommScope Inc., ARRIS International Limited, ARRIS Global Ltd., ARRIS US Holdings, Inc., ARRIS Solutions, Inc., ARRIS Technology, Inc., and ARRIS Enterprises, LLC (collectively, “CommScope”) move to request that Defendants’ Second Opposed Motion for

Entry of Order Focusing Patent Claims be added to the agenda for this Thursday's conference.

Dkt. No. 243.

The Court has currently scheduled a hearing for Thursday, September 1, 2022, at 1:30pm to address discovery disputes between TQ Delta, LLC and Defendants. Specifically, on August 1, 2022, the Court set a hearing on five motions: TQ Delta's First Motion to Compel Deposition from Nokia (Dkt. No. 199); Defendants Nokia Corp., Nokia Solutions and Networks Oy, and Nokia of America Corp.'s (collectively, "Nokia") Motion to Compel Discovery from TQ Delta (Dkt. No. 201); TQ Delta's First Motion to Compel Discovery from CommScope (Dkt. No. 234); and TQ Delta's Second Motion to Compel Discovery from CommScope (Dkt. No. 239). (Dkt. No. 240). On August 17, 2022, the Court added TQ Delta's First Motion to Compel Expert Depositions and Disclosure from Nokia (Dkt. No. 255) to the hearing. (Dkt. No. 260). On August 26, 2022, the Court added TQ Delta's Sixth Motion to Compel (Dkt. No. 271) to the hearing.

Also on August 26, 2022, the Central District of California transferred to this Court Nokia's Motion to Compel Out-of-District Subpoenas Against ZyXEL Communications, Inc. ("ZCI"). *In Re Subpoena to ZyXEL Communications, Inc.*, Case No. 2:22-mc-168-FMO, ECF No. 13 (C.D. Cal August 26, 2022). In that order, the court referenced this Court's "preference to address all pending discovery issues together." *Id.* at 5. Accordingly, Defendants believe that it would be worthwhile to hear the narrowing motion together with the discovery issues.

Indeed, Defendants' Second Opposed Motion for Entry of Order Focusing Patent Claims (Dkt. 243) is ripe for review as all briefing is complete. *See* Dkt. Nos. 243, 256, 261, and 269. Accordingly, in the interest of efficiency, Defendants respectfully request that the narrowing motion be considered in conjunction with the presently scheduled hearing.

Dated: August 31, 2022

Respectfully submitted,

/s/ M. Scott Stevens

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served electronically on August 31, 2022, on all counsel who have consented to electronic service.

/s/ *M. Scott Stevens*

M. Scott Stevens

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(h), counsel for all parties met and conferred regarding the relief requested above on August 31, 2022. Plaintiff TQ Delta indicated that it would not oppose Defendants' motion.

/s/ *M. Scott Stevens*

M. Scott Stevens